

RE: PUC Docket Number: E002/M-18-714
DATE: 6/21/2022

Dear Public Utility Commission,

As an Xcel customer that has been kept from going solar for 11 months by Xcel's current approach to rooftop solar, I wanted to comment on this proposal to improve Xcel's process of approving solar. What I am attempting to do is install a 7.8 kW solar array on my roof in New London, (Xcel Energy feeder/substation PAT313). On April 1, 2021 the solar installer I am working with applied for an interconnection permit, it took until June 5, 2021 to enter the Xcel queue. On July 15, 2021 we received notice from Xcel stating:

“your interconnection application has been put on hold temporarily while Xcel Energy sequentially reviews other applications ahead in the engineering queue at the same feeder/substation PAT313. These applications must be reviewed one at a time based on their queue position in order to maintain the safety and reliability of our grid for all our energy customers, pursuant to notice provided under MN DIP 5.2.2. There are currently 1 other projects ahead of yours in queue. This may add a 300 business day delay to your application timeline -- I apologize for the inconvenience. Please note the provided timeline is a *maximum* timeline and our teams are working diligently to ensure these studies are completed in a timely manner while also ensuring the safety of all our customers”.

3832574	SolarRewards Community	8/5/2020 8:22	Fast Track	1000	Solar PV	PAT	PAT313	Step 6: Documents & Contract Submission
4091580	SolarRewards Community	12/22/2020 10:13	Fast Track	1000	Solar PV	PAT	PAT313	Supplemental Review
4184665	SolarRewards Community	1/14/2021 12:12	Fast Track	1000	Solar PV	PAT	PAT313	On Hold
4426548	SolarRewards	6/5/2021 13:27	Simple	7.83	Solar PV	PAT	PAT313	On Hold

On June 9, 2022, we just received notice that this study is now happening:

“I am pleased to inform you that your project Case 04426548 is no longer on-hold and is now in active study. The new deadline for our engineers to perform the Supplemental Review is 7/14/2022. We appreciate your patience.”

I don't know if the study will allow us to go forward. The solar installer I am working with is pessimistic based on recent experience. In an email to me he said:

“in Frontenac, MN (south of Red Wing, MN) in Xcel territory I had someone just go through the supplemental review only to find no capacity due to a number of large solar gardens in queue. The next step for them if they wanted to move forward with their 9.99 kW residential system would be a \$15,000 impact study followed by a \$66,000 facilities study, followed by a \$2 million to \$6 million substation upgrade.”

Xcel's policies need to be improved so that we and others like us can go solar in a timely and affordable way. We started this project to take initiative on behalf of our climate/environment,

our children & grandchildren. We did this as private citizens at our personal cost (\$30,000 for PV panels + installation+ fees). Our initial experiences with Xcel were all positive. We were being encouraged from around the country by regional and national solar providers because Xcel had such positive and favorable programs (Solar Rewards) in place to encourage residential installation of PV systems. As part of the Morris Area Solar Co-op (a group buy program coordinated by Solar United Neighbors), we were envied because Xcel seemed to have programs in place to speed the favorable adoption of residential/farm PV installation. All the other Morris Co-op members were working with different utilities with less favorable programs in place. Interestingly, every other member was successful in getting their PV system installed by these less favorable (looking) power providers, and we are still waiting for Xcel to complete an engineering study. It is obvious to us now that perception is not the reality with Xcel's Solar Reward program, and that other providers are taking seriously the investments made by private individuals and working to get their systems installed to address our shared climate concerns.

It is our experience so far that Xcel has good ideas for its programs to support solar adoption, but poor execution. This execution issue can be seen any time you try to contact the Xcel solar program by email or by phone. Their response is nowhere near a 24-hour turnaround if they respond at all. This creates an accountability issue because they don't respond to customers questions or concerns about the solar program in a timely manner, if at all. Additionally, Xcel is treating very small residential PV projects the same as large solar garden PV projects as it relates to creating a que for study, when it would take over 10 residential PV projects to equal 1 solar garden project.

With regard to their interconnection review program, it has taken them almost 12 months to review 2 projects- our project and one other solar garden in Xcel Energy feeder/substation PAT313. Honestly, if Xcel thinks this kind of time is acceptable for an interconnect review of 2 projects, what will it be like when solar goes mainstream?

Private home residential PV installations are not the same as solar gardens. Individual families are financing these projects. Xcel needs to bring their solar execution and interconnection resources in line with their promotional materials, or they need to stop promoting their solar program, because from our experience they are out of synch.

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